

AFFIDAVIT

The State of Texas

)

) S.S.

County of Lubbock

)

I, Kimberly D. Pollard, of Lubbock, Texas, MAKE OATH AND SAY THAT:

1. I officially met Bishop James L'Keith Jones, currently serving as the New Mexico Jurisdictional Prelate in 1994, a few months before my 16th birthday (DOB: 1/29/1979) . He was 29 (3/20/1965). At that time, I was spending most of my weekends with a "Mother" figure from my church, First Church of God in Christ, Clovis New Mexico. She did PR work for the Jurisdiction, so they communicated frequently. One particular day, I happen to have answered the phone and that's how he and I began communicating. Once I told him how old I was, he couldn't believe it, he stated that he thought that I was at least 23-25 years in age. He made mention of how mature I was for my age that he could not date me until I turned 18, so until then we could only talk on the phone. Over the next few months we would talk on a regular basis as he still could not believe that I was only 16, he always pointed out that I was so mature and pretty to be so young. We'd see each other during district meetings, fellowships or state meetings around the State: Clovis, Roswell, Las Cruces or Hobbs. He'd also go to Clovis (where I resided) for other reasons, not just for district meetings or state meetings, and we'd see each other as well.
2. August 1995 during our annual Holy Convocation in Albuquerque NM, he came to the hotel where I was staying, which was the designated hotel for the meeting. My best friend, Dorcas was with me and so he asked us if we wanted to go with him to run errands, we both said yes. He allowed Dorcas to drive his car, it was an Infiniti Q45 (Rental). He said he needed to stop by the Double Tree Hotel to pick up some fruit/gift baskets that were left by delegates (Exhibits 1 and 42) We pulled into the hotel and he got out and went in. When he came back to the car, he was empty handed and he asked me to go in and help him with the baskets, I went in with him. Once in the room, I grabbed a basket and headed towards the door, only to be stopped by him. He said he needed to ask me something. He said someone had told him that I said we had kissed and was that true, did I in fact tell someone we kissed? My reply was no. He then asked, "So if I kiss you now, would you tell anyone?" I told him no. That's when he kissed me, took the basket out of my hand and lead me over to the bed, we had sex.

He ended up preaching that night and afterwards, I asked him how could he just get up and

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preach knowing what we just did? In his response, he told me that a sign of maturity was by not asking a lot of questions and just living life (exhibit 43). My questions irritated him so at that point, I tried to limit my questions about the whole ordeal because I didn't want him to think that I was immature and could not handle the relationship.

I ended up disclosing this information to an individual who was 5 years my senior only because she was making fun of the fact that she didn't think he'd ever had sex and was still a virgin. She promised not to tell anyone but after the meeting concluded and we went back home to Clovis, I found out that she had told my "mother" figure. She called me letting me know what she had heard, how disappointed she was because she spoke to Elder Jones and he said he viewed me only as a little sister, since I was Dorcas' best friend. She also said that she would not tell my mother. A week or so later she ended up telling my mother and when my mother brought it up to me, she stated that me that she was going to have him put in jail. As a 16 year old, in love with him, I did lie and say that we were not sleeping together because I didn't want him to go to jail. By doing that, I then had a scarlet letter carved into my head. He was very upset that I opened my mouth and basically told me that if he wasn't saying anything about it, I shouldn't either. After it all calmed down, we continued and he let me know that if I ever chose to speak about it again, he would always have the upper hand.

3. My relationship with the "mother" figure wasn't the same after that so I didn't go to her house anymore. I gave him my house number and that's how we continued to talk or I'd call him with a calling card on a payphone while I was at school (exhibit 51:1, 51:2)) He'd call my house and if I didn't answer, he'd hang up. My mother began to become suspicious about all the hang ups and began to question me about the relationship again. It got to the point to where our relationship became strained. I vented to him about it all the time so he came up with the idea to write my mother a letter so that it would possibly make things amicable between us. In this letter, he stated how rumors, gossip, scandals and lies have always made a path to his name. He expressed to her that I was an amazing youth in the NM Jurisdiction and that I had not done anything wrong. He hoped this would clear up any confusion or anything that was being questioned. After the letter, my mother calmed down a bit but only for a little while, he and I continued. When he'd come to Clovis for visits outside of a District/State Meeting, we'd also see each other, I'd go to his room and we would have sexual intercourse.
4. July of 1997, he married Rosalind Sanders and I had no prior knowledge of her at all. I found out about the upcoming nuptials via a church announcement. When I confronted him about he said it was something that he "had" to do but that nothing would change. I was confused by that

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because for me it would seem that so much would change because he was getting married. After he married, I did not contact him at all, trying to respect his union but at the same time, deal with the hurt and devastation that it caused for me. 5 months later in December, he called saying that he missed me and us along with other things and so I fell right back a relationship with him. He also made it very clear that I could call him anytime and anywhere, even at home, as he paid all the bills and Rosalind did not hinder him from doing anything, ever (Exhibit) 44).

5. August 1998, we met up at yet another state meeting, in Hobbs NM. I waited for him to give me the sign the leave the church, as church service was still going on. When he gave the signal, I left. My friend, Steven Mackey agreed to take me to the Allsup's Convenience Store on the outskirts of the city to meet him. We pulled up to the store and he was parked there waiting for me. I got into his Mitsubishi Monterro Sport SUV and we left. We drove around the city for while due to not being able to go to a hotel because of the meeting that was taking place. He decided to park on the side of the road on the outskirts of the city and we had sex (Exhibit 2, 45 and 45a) Afterwards, he drove me to my sisters house. He was right, nothing really changed for us after he got married, we continued as before he was married.
6. In 1999 during another state meeting, he came to my city (Clovis) alone, as he often would go to the meetings alone then Rosalind would come towards the end of the meeting. I met him at his hotel and he left the door open for me, we had sex. He decided to leave first and told me to wait 10-15 minutes before I left because a lot of people from Jurisdiction were staying at that hotel, I did as he asked, only to be seen by someone. He later informed me that the late Bishop W. C. Green Sr. told him that when he traveled, he needed to make sure his wife was with him and for him to not be in hotel rooms with me.

July 2000, I moved to Texas. He would come to the State meetings in Texas as New Mexico and the Texas Northwest Jurisdiction often supported each other, he would mostly come without Rosalind and we would be together physically and sexually during those times as well. This happened for at least 2 years. Not every encounter was a sexual one, but most of them were. I was finally able to break away from him after that, our communication came to a halt, with phone calls, emails and texts on each other's birthdays or just small talk casual conversation here and there.

7. November 12, 2014 he messaged me letting me know that he was coming to Lubbock because his mother was in the hospital and that he wanted to see me. He was just flying in from the Holy 003

Convocation. Once he checked into the Overton Hotel, I met him there, Room 1306 (Exhibit 47:1-5). It was there that he discussed in detail about his pending divorce and that how I had always managed to bounce back from all that things he has thrown at me and that if it was the other way around, he didn't think that he could do it, as I had. He said that he wanted to pay me back for the past 20 years of bad regarding our relationship and all that I went through because of him. It was in that room where he talked about he had already started planning for his divorce by moving money to different accounts, he had finally paid off his navigator and put it in the Church name and was going to do the same with his next vehicle.

He discussed wanting to make more memories, right memories with me. And that he viewed me and us differently and took it very seriously now. He explained why he had cursed me out whenever I informed him of my pregnancy. He said it was because he was hurt by it. We discussed how we have grown with each other over the 20 years and how we were in a great place at this time in our relationship. After the conversation, we did have sexual intercourse.

8. December 2014 we met up in Clovis, as he was doing some work at my home church, First Church of God in Christ, Wednesday night bible study. I drove from Lubbock and met him at his hotel room 107 at the Hampton Inn for the night (exhibit 48:1, 48:6)). We spent time together, conversed and then we had sexual intercourse on that night. I left the next day after he left. Our schedules began to be a conflict regarding us being able to physically see each other as well as my daughter "needing love". I initially brought up Skype (Exhibit 49:1-49:2) but was then told about a different application called Glide, so I installed that application, on my phone and invited him to do that same. That helped us somewhat because we were able to talk and see each other more frequently.

For my birthdays and for Valentines Day, he'd always send an edible arrangement or flowers (Exhibit 50:1-50:8). He promised he was going to make things right and was going to show me how serious he was about us, so I believed him.

9. We often discussed the changes that would occur regarding his divorce and our union. He thanked me for hanging in there with him and to trust him (Exhibit 51:1-51:2) things were being handled. As we discussed the financial part of his pending divorce, he made mention of a Bishop in AZ that was going through a divorce in which he was using his process as a blueprint for his own divorce from Rosalind. Stated that he had to pay his wife 65K but then his wife took him back to court for a larger amount. Said that he had to present his case to Bishop Blake (Exhibit 51:3-51:5) and he would decide if he could divorce or not but even with that, he could lose the

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church and position. He explained to me that it was a long process so during that, we would just plan.

Towards the end of 2015 while he was in Las Vegas, we had an argument about it and I explained to him then that I was tired of waiting and that he was going to go have to do something to really prove to me that he was working on us being together the right way because 20 years was a long time. Again, he said he would prove it to me and so January 2016 he chose to celebrate my birthday with me. We were going to go to Dallas or El Paso Texas because Bishop Watson was having a conference in Lubbock (exhibit 33). Something came up with a church in Hobbs NM so he chose to spend his time in Lubbock with me. He flew in on that Wednesday, January 27th my birthday was on that Friday, January 29th. When he got in on Wednesday night. He gave me jewelry, let me know that it wasn't for my birthday but that was from Christmas (2015). He also said that he had a lot of tricks up his sleeve. He said I would be so happy that I would cry.

We got a room at the Embassy Suites Hotel (exhibit 52:1) and after getting settled in, we had sex several times and he also gave me my birthday gift which was a Samsung Tablet. I already had one so he said he would take it back and get me jewelry. Exhibits numbered 52:2-52:13 are pictures and videos from my birthday celebration.

After my birthday celebration, I was showing him rings for when the time came, he told me that he would buy what's in the budget (Exhibits 53:1-53:3) He informed me that he was looking forward to celebrating Valentines weekend with no details or any pressure. We were not able to see each other physically but he sent me a floral arrangement and as always, he asked to see a picture of my arrangement or anything that he sent me (Exhibit 50:8).

10. On February 21, 2016 he told me that he would send my daughter, [REDACTED] a video message. (Exhibit 54). Jireh loved him and had many interactions with him via Glide messaging and over the phone, he was very involved. In the video, he was playing around with her as they always did but then he stopped and then made a very poor judgment in telling her how sexy she looked in her night gown. I responded saying, "Sexy? 6?", he didn't respond. Matter of fact, I didn't hear from him for a few days after that and that was not like him at all. I was very uncomfortable with that but was trying to some how make sense of it and down play it but as the days went by, my eyes began to open and I believed that he was trying to groom my daughter just as he had did me when I was 15. I looked back over the years of involvement with my daughter and the way he treated her and interacted with her, she was his biggest fan so it only left me to believe that this was all strategically planned by him to violate her in the future.

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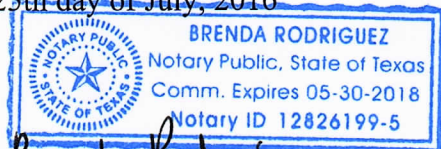
In March, I attended a State Meeting in Clovis, we ended up staying in the same hotel unbeknownst to me because in a prior conversation, he mentioned he had reservations at two of the Hotels there in Clovis. I told him where I was staying and that was it. While at the meeting, he told me, his words, " I am not going to bring any attention to you, I am not going to tolerate anyone looking at you bad because of me. I hope you catch my drift. I believe I trust you more than you know, I pray that it never gets violated, because I'm going to do all I can to keep what we have sealed and between us". After this meeting ended, it was brought to my attention that he was saying that I was his stalker, that I was toxic, unstable and crazy. I was extremely hurt by it and felt that he was only putting that out there in an attempt to try to cover the relationship. I questioned him about it and at first he proceeded to say that he never said it, nor would ever have a reason to say it because of the relationship. After going back and forth as to him saying he never said it to maybe he said it, then to if he said it, he only said it because he was under so much pressure and so on. He knew that I was very upset and so he resorted to his number one fallback which was asking for prayer. That was one of his ways of always reeling me back in. "Pray for me", "You're the only person I trust", " I'm going through so much right now" " I'm always being attacked," "We are prayer partners, we pray for each other". He knew that I would never say no to praying with him or for him.

The additional exhibits 55-66 are from just some of the interactions between him, myself and Jireh. I believe it will offer more support in showing the true nature of our relationship, the comfort level, trust and familiarity between all parties.

SUBSCRIBED AND SWORN TO)

BEFORE ME, on the)


25th day of July, 2016)





NOTARY PUBLIC)


My Commission expires: 5/30/2018)


Kimberly D. Pollard


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
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Back

Conversation with 5054531118 (5474)

Why do you want to know who took my virginity? You don't know him.  2015-05-25 12:16

What do you mean? A part left I left back? 2015-05-25 12:15

 There seems to be a part of you left back at the suicide 2015-05-25 12:05

 If I didn't take your virginity ...who did? 2015-05-25 12:05

And that's just the tip of the iceberg.
At any rate, have a great day. Glad you're feeling better ♥ 2015-05-25 11:59


So I ask YOU... Did you plan our first encounter??? Double Tree Hotel 2015-05-25 11:41


I think you did it to hurt me because you knew how I felt about you. But that's in the past 2015-05-25 11:35


You would get mad and say you were done with me forever (can show you better than I can tell you). but then turn around and contact me again. 2015-05-25 11:34


You tried to make me leave? Lol. OK. Not sure how... You are the one that kept coming back to me! 2015-05-25 11:33


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2015-05-25 11:41

I think you did it to hurt me because you knew how I felt about you. But that's in the past
2015-05-25 11:35


You would get mad and say you were done with me forever (can show you better than I can tell you), but then turn around and contact me again.
2015-05-25 11:34

You tried to make me leave? Lol. OK. Not sure how... You are the one that kept coming back to me!
2015-05-25 11:33

 In reality I didn't want you hurt. I looked at your innocence. I tried to make you leave wrong persuasion bad choice on my part
2015-05-25 11:31

You're asking so I'm telling. Can probably show you better than I can tell you!
2015-05-25 11:11


I do think you planned our first encounter but I could be wrong
2015-05-25 11:10

 Okay
2015-05-25 11:09

Anytime I asked questions, you would tell me that I was showing you how immature I was and wasn't ready to be with you. Because when you're mature, you don't ask questions lol. So I'd shut up really quick and leave it alone because I didn't want to make you angry or upset.
2015-05-25 11:09

No, you didn't take my virginity. We discussed that before
2015-05-25 11:06

Exhibit 43

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2014-12-11 23:55

 What's wrong with my eyes

Exhibit 51:1 2014-12-11 23:54

Your eyes...
2014-12-11 23:50

I see that you got your hair cut
2014-12-11 23:48


☹️☹️☹️
2014-12-11 23:47


I'm home now
2014-12-11 22:04

TRUST me, I'm really trying to hang in there. I feel you're worth it, we're worth it. But I'm growing weary, amongst other things
2014-12-11 14:18

It was right on time for you babe! Hold on to that.
2014-12-11 14:11

 I want you to hang in there Eventhough it's complex , I'm in wirh you
2014-12-11 14:06

 Wow ! That's good !!
2014-12-11 14:05

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Conversation with 5054531118 (5474) **Exhibit 51:2**

How was your day?
2014-12-13 00:04

Of course I care. When I say that I'm with you, I mean just that very thing. I'm with YOU. When you hurt, I hurt and that's real talk. It's almost like you're a part of me. Jireh is my heartbeat as are you.


Rehearsal was AMAZING last night. I went in one way and God completely lifted the weights off of me and I just let it flow. We were there for an extra hour because I couldn't stop, they didn't want to stop, it was heavy! So be encouraged, know that you're never fighting alone. You have the victory, we have the victory! Great day to you my love and I won't bother you today lol.
2014-12-12 10:00

 Good morningnow that made me feel good just knowing someone knows and cares! Rested last night myself ...wish I could do it two nights in a row
I want you to have the best day and know you are my thoughts and in my heart
2014-12-12 09:46

Looking into your eyes on this picture made me sad. I guess I'm looking beyond your eyes and seeing inside of you, idk.
2014-12-12 08:57

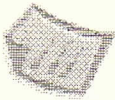
Good morning. I fell asleep last night, needed the rest.
2014-12-12 08:55

They don't look right to me
2014-12-11 23:55

 What's wrong with my eyes
2014-12-11 23:54

Your eyes...
2014-12-11 23:50

010



Read Message In-Box

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From: PASTORJLJ <PASTORJLJ@aol.com>

Save Address

Block Sender

Date: Mon, 6 Apr 1998 23:54:58 EDT

To: kymani_p@HOTMAIL.COM

Subject: Re: hearing from me!!!!!!

Reply

Reply All

Forward

Delete

Previous

Next

Close

Hey!!!

Well I am writing your response. You have a lot of controversial things to say as always. Why are you like that? I know that you are not void of understanding---now are you?
I did tell you that the middle of the week would be an excellent opportunity for you to come, but not the end of the week. I know that the end of the week is horrid for me as far as time wise. Like I said before, I guess the schedule conflict will always be an issue. Now, her, I guess you are referring to my wife Roz, she does not hinder me from doing what I want to do---NEVER. I guess if I was married to you that would be the way you would handle things, having to be accountable to you at all times---now isn't that controversial. Why would I invite you to Memphis if 'her' was going to be there? 'Her' is not going and I will be by myself---understand???

Is Sheila coming?????? If Shelia is coming it will be okay and I will make the necessary accomodations. If she is not coming, it would not be advantageous for you and Hezzie to come without a musician, because I will not have a musician to play for you all on Sunday. Do you understand that? I will try to give you a call sometime this week, but when you write me back, I want to know the best time to call you, Also, I want to know if your computer is with you or do you have to use the internet somewhere else? Let me know these things.

I will be in Portales on the 26th, but I don't know how long it will be
Take care and Peace out!!!!

J

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Reply All

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2014-06-30 13:31

You ended up ejaculating on my stomach and then you gave me wipes :/

2014-06-30 13:28

I remember the whole thing

2014-06-30 13:28

Wow. Okay.

2014-06-30 13:28

I didn't remember not

2014-06-30 13:27

What do you mean ???

2014-06-30 13:24

???

2014-06-30 13:24

Hobbs, side of the road, your Montero, no protection

2014-06-30 13:24


Not all the time

2014-06-30 13:23

How is that? Were there not any precautions

2014-06-30 13:23

Exhibit 45

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Exhibit 45A

Conversation with 15054531118 (5474)

What does that mean?

2014-06-30 13:36

I was upset because you came on me and not inside of me

2014-06-30 13:35

I'm always older than you

2014-06-30 13:35

Right.

2014-06-30 13:33

I do Remember now. And you got upset with me because I did that.

2014-06-30 13:31

I can pretty much tell you all that went down every time we got down lol

2014-06-30 13:31

You ended up ejaculating on my stomach and then you gave me wipes :/

2014-06-30 13:28


I remember the whole thing

2014-06-30 13:28

Wow. Okay.

2014-06-30 13:28

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2014-11-12 16:56

Pulling up
2014-11-12 16:54

 I'm in
2014-11-12 16:54

I just tried to call you again
2014-11-12 16:19

 Huh
2014-11-12 16:18


I just called you again
2014-11-12 16:18

 Me too
2014-11-12 16:18

Tried calling
2014-11-12 15:47

I'm having a moment lol. My other preference us TownePlace Suites
2014-11-12 15:07

I'm pretty much across the street from Homewood
2014-11-12 15:00

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Exhibit 47:2

Conversation with 15054531118 (5474)

You should have left one at the front desk for me
2014-11-12 17:04

I don't have an access card to get to your floor. I'm on the elevator
2014-11-12 17:04

1306
2014-11-12 17:02

Ok. Come to elevator coming to get u
2014-11-12 17:02

Really? I'm sitting in the lobby
2014-11-12 17:01


Where do I go
2014-11-12 16:56


Pulling up
2014-11-12 16:54


I'm in
2014-11-12 16:54


I just tried to call you again
2014-11-12 16:19


015 11:52 AM 7/20/2016


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
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2014-11-13 09:00

 Great Morning! How are you this morning ? **Exhibit 47:3** 2014-11-13 08:49


Good morning my love
2014-11-13 08:28

 Dreams are meant to happen 2014-11-13 00:34

I can definitely say the same about you. Seems like tonight was a dream.
2014-11-13 00:01


 You are very very special to me 2014-11-13 00:00

Oh ok. Just showered and now laying in my bed
2014-11-12 23:59

 Not yet.....still up with my brother. What are you doing? 2014-11-12 23:58

In bed?
2014-11-12 23:44

 Let me know when u get to elevator. 2014-11-12 17:05

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Exhibit 47:4

Conversation with 15054531118 (5474)

That glow is all YOU!

2014-11-13 10:33

really??? Okay.

2014-11-13 10:33

You look great and glowing

2014-11-13 10:31

I'm still here....not sure if I have to go to Hobbs this evening. I will let you know

2014-11-13 10:31

I have to ask this before I make plans and they don't fall through. Are you still leaving tomorrow

2014-11-13 10:29

I'm remembering the texting protocol you schooled me on last night☺

2014-11-13 09:00

Great Morning! How are you this morning ?

2014-11-13 08:49

Good morning my love


2014-11-13 08:28

Dreams are meant to happen

2014-11-13 00:34

Exhibit 47:5



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Exactly! You're unbelievable and my feelings are hurt. Have a good night, good day and drive back safely. Love you
2014-12-17 20:50

You're nuts! What am I supposed to do with [REDACTED]?
2014-12-17 20:46


 Yes
2014-12-17 20:45

Really??
2014-12-17 20:43

 Come on
2014-12-17 20:38

I'm a little disappointed that you didn't tell me earlier that you were staying in Clovis, considering! But I got you
2014-12-17 20:25

I see
2014-12-17 19:35


 Yes
2014-12-17 19:35

Are you staying in Clovis tonight
2014-12-17 18:58

Safe travels to you on today babe. I LOVE YOU
2014-12-17 10:39

Good night

Exhibit 48:1

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Conversation with 5054531118 (5474)


Exhibit 48:2

Leaving in about 20 minutes
2014-12-17 21:34


I'm coming
2014-12-17 21:16

Exactly! You're unbelievable and my feelings are hurt. Have a good night. good day and drive back safely. Love you
2014-12-17 20:50

You're nuts! What am I supposed to do with Ji?
2014-12-17 20:46

 Yes
2014-12-17 20:45


Really??
2014-12-17 20:43

 Come on
2014-12-17 20:38

I'm a little disappointed that you didn't tell me earlier that you were staying in Clovis, considering! But I got you
2014-12-17 20:25

I see
2014-12-17 19:35

020

**kiji1**
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Get service

2014-12-18 20:35



 Lol!!! I don't have any supplements



Exhibit 48:3 2014-12-18 20:34


 absolutely lit up when I kissed her forehead and told her it was from you. WE really love you and I personally want this (us) with all of my heart! I'm literally in the bed now so good night. I c
an't say sweet dreams because it can't get any sweeter than last night. Fyi, you were AMAZING!!! That supplement worked *wink*

2014-12-18 20:28

I'm home

2014-12-18 13:33


 
2014-12-18 13:24

 I love the eyebrows

2014-12-18 13:22

Leaving

2014-12-18 12:11

 107


2014-12-18 00:05

I'm here

2014-12-18 00:04

Where are you staying. My phone might be dead left my car charger

2014-12-17 22:10

**kiji1**
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Get service


[SMS-22D06M15Y](#) [SMS](#)

Back

Exhibit 48:4


Conversation with 5054531118 (5474)

 lol
2014-12-18 20:38


 Absolutely!!
2014-12-18 20:38

I was totally okay with you taking a "supplement" because it allowed me to get SEVERAL in... lol. Just saying
2014-12-18 20:38

You CANNOT tell me you we doing all of that simply because of a condom?! Lol
2014-12-18 20:37


 I promise. I don't take supplements and besides I would not know what to take. You saw me take supplement
2014-12-18 20:36

LIES!!! 😏 okay babe! 🙄
2014-12-18 20:35

 Lol!!! I don't have any supplements
2014-12-18 20:34

Ji absolutely lit up when I kissed her forehead and told her it was from you. WE really love you and I personally want this (us) with all of my heart! I'm literally in the bed now so good night. I can't say sweet dreams because it can't get any sweeter than last night. Fyi, you were AMAZING!!! That supplement worked *wink*
2014-12-18 20:28

I'm home
2014-12-18 13:33

**kiji1**
[Log out](#)

Regular Member

Home

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Profile

Favorites


Get service

< SMS-22D06M15Y SMS


Back


Conversation with 5054531118 (5474) **Exhibit 49:1**


From you
2014-12-28 19:01

 She needs love
2014-12-28 19:01

She's extremely whiny today!!!
2014-12-28 18:57


 Sweeter than that drink!
2014-12-28 18:52

 2014-12-28 18:35


 No
2014-12-28 18:35

Do you Skype?
2014-12-28 17:34

I'll be watching tonight. if you all are having service
2014-12-28 17:11

 2014-12-28 16:21

023

**kiji1**
[Log out](#)

Regular Member

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Profile

Favorites

Get service

my prayers and when you... I appreciate it... I talked about surrender on today and went into I Give Myself Away... She's an only child and she's been around my nephews for the past few days, I think she's just over it and ready to have some normalcy... Which is why I asked you about Skype. Mommy can only do so much. It's your turn... Yes

2014-12-31 13:11

2014-12-31 13:00

3 days
2014-12-31 12:57

2014-12-28 22:58

2014-12-28 22:50

2014-12-28 22:34

2014-12-28 20:55

2014-12-28 19:04

2014-12-28 19:03

2014-12-28 19:02

Exhibit 49:2

Exhibit 50:1

May today be your happiest. Know that you are
loved and thought of in all of the most special
ways. Happy Birthday!

JL

← LJ ▼

5054531118

Exhibit 50:2

CALL

MORE

Friday, February 12, 2016

Fell asleep on you last night.
Woke up and saw my message
was still waiting to be sent...
good morning

10:12 AM

What was it? You fell asleep?
It must be the soul food

10:13 AM

"You don't sound black!"



MMS
10:24 AM

Cruel!!!! Lol

10:34 AM

You have been around me
enough to know that I can
definitely go there so don't try
it

10:35 AM

Baaaaabe

6:10 PM

Hello

📎 Enter message



026
SEND

LJ ▼

5054531118

Exhibit 50:3

CALL

MORE

6:10 PM

Baaaaabe

Hell o

6:26 PM

I Sent you a delivery did you get it ?

6:40 PM

I'll check with them

6:57 PM

Who do you go through? I need to give you the floral store that delivers there all the time with no problem

6:59 PM

No delivery at my job

I'm checking nowit does not make sense when you nationwide delivery serviceit should not matter

7:20 PM

FTD.COM recipient information needed (Order Number:FRM1252141)

Today at 4:38 PM



Thank you for your recent purchase from [FTD.COM](https://www.ftd.com).

We will need additional recipient information from you to

Enter message



027
SEND

LJ ▼

5054531118

Exhibit 50:4

CALL

MORE

FTD.COM recipient information
 needed (Order
 Number:FRM1252141)

Today at 4:38 PM



Thank you for your recent purchase from [FTD.COM](http://www.ftd.com).

We will need additional recipient information from you to deliver your order.

Please contact us with your address (including apartment or suite number), zip code, and phone number.

Thank you for choosing [FTD.COM](http://www.ftd.com).

If you have any questions about your order, please call [1-800-SEND-FTD](tel:1800SENDFTD) (1-800-736-3383)

Sincerely,
Joseph

Email us via this link:

[http://www.ftd.com/custserv/email.epl?](http://www.ftd.com/custserv/email.epl?type=email&AID=ordering&newto=orderinquiry)

[type=email&AID=ordering&newto=orderinquiry](http://www.ftd.com/custserv/email.epl?type=email&AID=ordering&newto=orderinquiry)

MMS

7:21 PM

They said you were not a patientthey said your number is a bad number

I'm cussing these damn fools out right now

7:30 PM

Telling me they will do will refund me in 3-5 Days

7:31 PM

Huh?? Oh my... wow! Yeah, I'm not a patient lol. Don't cuss

Enter message



028
SEND

← LJ ▼

5054531118

Exhibit 50:5

CALL

MORE

7:31 PM

Huh?? Oh my... wow! Yeah, I'm not a patient lol. Don't cuss them babe!!!! Let them make it

7:32 PM

That's so white!!!! Motherfers



That was for you

7:32 PM

That is not what I told their asses on the phone

7:33 PM

Stop cussing

7:33 PM

I Won't

7:34 PM

Please?

7:34 PM

Now the fuckers hung up On me

7:34 PM

Ewwwww.... language babe! Lol.

7:34 PM

The good thing is its not valentine's day 😜

7:38 PM

📎 Enter message



029
SEND

LJ ▼
 5054531118

Exhibit 50:6

CALL MORE

7:34 PM

Ewwwww,... language babe! Lol.

7:38 PM

The good thing is its not valentine's day 😊

7:45 PM

I think for future reference (because I do LOVE getting flowers and everything else from you lol), you should use a local place. I say that only because they are familiar with UMC and the areas of the hospital. I can give you one that delivers there all the time, that has a website so that you can see what you're sending me. Thank you in advance though. I know I'll love it!

Saturday, February 13, 2016

12:16 PM

I got my flowers!!!! 🥰🥰🥰
 😍😍😍❤️ thank you so much.
 You make me feel like the best woman in the world! Thank you baby. I love you. Will send a pic later, getting Ji ready for a party at 1. Well she's dressed, I gotta get dressed 💋

Enter message



030
SEND

LJ ▼

5054531118

Exhibit 50:7

CALL

MORE

Saturday, February 13, 2016

I got my flowers!!!! 🥰🥰🥰
 😘😘😘❤️ thank you so much.
 You make me feel like the best
 woman in the world! Thank you
 baby. I love you. Will send a pic
 later, getting Ji ready for a
 party at 1. Well she's dressed, I
 gotta get dressed 💋

12:16 PM

That is great. Please enjoy !

2:40 PM

Can you send me a pic of your flowers

6:56 PM

Yes, not home yet. I was on my
 way out the door when I texted
 you about them (was getting
 dressed to leave) should be
 home in about 45 minutes and I
 surely will

6:58 PM

----just wanted to know, they
 did not give you the product I
 ordered

7:00 PM

Oh my. How do you know that?
 I'll send it as soon as I get
 home.

7:01 PM

Enter message



031
SEND

LJ ▼

5054531118

Exhibit 50:8

CALL

MORE

7:01 PM

Oh my. How do you know that?
I'll send it as soon as I get home.



Email

7:02 PM

7:02 PM

Oh ok.

7:03 PM

Yeah, from here on out,
you should go local (here in
Lubbock) . I'll get the info
to you and you won't be
disappointed



MMS

6:38 PM

Enter message



032
SEND

← LJ ▼
5054531118

Exhibit 51:3

CALL MORE

Wednesday, February 10, 2016

Something happen ?

3:30 PM

What did I miss? What are you talking about?

3:36 PM

You said a great day to talk ?

3:46 PM

We are suppose to have a serious talk. ????

4:48 PM

Lol, Ok. We LIGHTLY touched on it while you here but we agreed that my birthday wasn't the time for it.

Apparently you don't remember 🙄

5:05 PM

Where are you in presenting your divorce to Blake? I know you said it's a long process so I'm just wondering where we are with that

5:06 PM

You know Feb 13th is national breakup day

5:08 PM

📎 Enter message



033
SEND


← LJ ▼

5054531118

Exhibit51:4

CALL

MORE

 You know Feb 13th is national breakup day


5:08 PM

Cruel

5:08 PM

What are you trying to say?
You're breaking up with me????

5:09 PM

 No it seems like you are
I don't recall us even discussing this at all two weeks ago


5:10 PM

Not at all. Nothing I've said remotely sound like I'm breaking up with you lol. I just asked a simple question. Wasn't ugly or angry about it. Then you come with, Feb 13th being national break up day.

5:12 PM

Great diversion 👍👉

5:16 PM

 No Diversion.....we talking about 2 different things.
I was just making a comment but disregard ... Please insert

5:22 PM

In case you're lost:

 Enter message




034
SEND

← LJ ▾
5054531118

Exhibit 51:5

CALL MORE

 No Diversion.....we talking about 2 different things. I was just making a comment but disregard ... Please insert

5:22 PM

In case you're lost:

Where are you in presenting your divorce to Blake? I know you said it's a long process so I'm just wondering where we are with that

5:51 PM

 I have not presented anything yet

5:54 PM

Ok. Thank you 😊

5:55 PM

Painless... Wasn't it? Lol. Like I told you while you were here, just the fact that you put us first and celebrated my day with me, spoke Volumes and erased so much. I'm all in, you have ALL of me and I just needed to know that this will progress into what we both want. And not in 4 or 5 more years!

6:06 PM

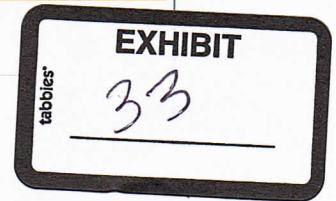
 Enter message



035
SEND



Friday, January 22, 2016



Hello....a week away from
your day. Trying to figure it
out...can't go
To Lubbock , bill is having
something there next
weekend....I'm thinking
maybe El Paso ?? Or Dallas?

6:14 AM

Dallas is easier I think. What
do you think

6:55 AM

I've never been to el paso,
I'm open

6:55 AM

Hey babe!

7:28 PM

Saturday, January 23, 2016

Good morning love

9:46 AM

 Enter message



SEND

← LJ ▾
5054531118

Exhibit 52:1

CALL

MORE

Friday, January 29, 2016

Yes

12:06 AM

Sorry to make you upsetyou don't have to come if you don't want to.

12:07 AM

I'm already at the embassy.
Interesting evening that's all

12:08 AM

Where

12:13 AM

In my car

12:15 AM

Cool . Door is Open

12:19 AM

What you're missing while you were in the shower and I'm waiting

11:35 AM

The mall is right across the street

2:34 PM

Your Cologne is on me... 🍷

5:07 PM

I made it back to Albuquerque.
You are an amazing womanI



Enter message



037
SEND



038

Exhibit 52:3



039









Monday, February 8, 2016



MMS
5:41 PM

There's your necklace that went perfectly with my top 😁

5:42 PM



Looks great

5:46 PM

I missssssssssssssssssss YOU! 🙄

5:54 PM



I miss you too, Kim.

6:20 PM

6:20 PM

👊👊👊👊👊👊👊👊

← LJ ▾
5054531118

Exhibit 53:2

CALL MORE

I miss you too, Kim.

6:20 PM

6:20 PM



MMS
7:54 PM

For future reference.

7:54 PM

Silver

Glass

7:55 PM

You have jokes!?

7:57 PM

It looks like it

7:58 PM

and will have waited too damn long! 💍 👍 😊

7:59 PM

Cussing like a white girl

📎 Enter message



045
SEND

← LJ ▼
5054531118

Exhibit 53:3

CALL MORE

Cussing like a white girl 8:02 PM

Lol. No, black people say damn all the time

Other words Too 8:03 PM

Just thought I'd help you out, so that you'd know what I like... make it easier on you.

I will buy what's in the budget 8:03 PM

As long as it's more than a Cracker Box budget ring, I'm good! 😁

You got the most important one right.cracker 8:10 PM

😂 that made my side hurt!



📎 Enter message



046
SEND

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

**KIMBERLY D. POLLARD and
J.S. (MINOR CHILD),**

Plaintiffs,

V.

**CHURCH OF GOD IN CHRIST, INC.;
CHURCH OF GOD IN CHRIST,
BOARD OF BISHOPS; and BISHOP
JAMES L'KEITH JONES**

Defendants.

15

Case No. 2:16-cv-000238-J

**KIMBERLY D. POLLARD ANSWERS TO
CHURCH OF GOD IN
CHRIST INC. & CHURCH OF GOD IN
CHRIST BOARD OF BISHOPS FIRST SET
OF INTERROGATORIES**

TO: DEFENDANTS, CHURCH IN CHRIST INC., & CHURCH OF GOD IN CHRIST BOARD OF BISHOPS through their Attorney of record Justin Jeter, Jeter Melder, LLP , 1111 S. Akard Street, Suite 100, Dallas, TX 75215.

I.

Interrogatories

1. Please state your full name, maiden name (if applicable), current residence address and telephone number, date of birth, driver's license number and state, and Social Security number.

RESPONSE: *Kimberly De'Shaun Pollard (Maiden name Nunn).* [REDACTED]

[REDACTED] . DOB. 1-29-1979. [REDACTED]

2. If you have ever been a party to any other lawsuit, please provide the following information:

- a. The style or caption of the case
- b. The court the case was filed in;
- c. The county and state the lawsuit was filed in;
- d. The court's docket number; and
- e. A brief description of the incident that gave rise to the lawsuit.

RESPONSE: N/A

3. Please state whether or not you have ever made a claim against any person, entity, or insurance company for personal injuries that did not result in the filing of a lawsuit. If so, then please provide the following information:

- a. The name and address of the person, entity or insurance company;
- b. The part of the body you injured and a description of the injury you suffered;
- c. When you made the claim made; and
- d. The amount of any payments or settlements.

RESPONSE: N/A

4. State your employment history since 1995, including the following information for each job:
- a. Each employer's name and address;
 - b. Your job titles and pay for each employer;
 - c. A description of your job duties;
 - d. Your supervisor's name and address; and
 - e. The reason for your separation from each employer.

RESPONSE: Hawkins Preschool & Daycare 1605 Sheldon Clovis NM 88101 (575)

762-8972. Assistant. Employed 1997-2000 Minimum wage. Supervise and monitor the safety of children in their care. Prepared meals and organized mealtimes and snacks for children. Helped children keep good hygiene. Changed the diapers of infants and toddlers. Organized activities or implemented a curriculum that allowed children to learn. Developed schedules and routines to ensure that children had enough physical activity, rest, and playtime. Jody Rush (Supervisor/Owner) Address 1605 Sheldon Clovis NM 88101 Ph: (575) 762-8972
Moved to Texas

Cingular Wireless: 601 University Ave. Lubbock TX. 79401 Employeeed 2000-2003 Customer Service Rep. I do not recall the pay rate. Handled customer questions, complaints, and billing inquiries. Resolved customer issues. Offered alternative solutions where appropriate with the objective of retaining customer's business. Made financial decisions to protect/collect revenues and adjusted customer accounts. Adrian Chavez, Jennifer Hornburg, Mikal Loftus. I do not have any contact information for them. I was terminated in 2003.

Cox Communications 6710 Hartford Ave Lubbock Texas 79413 Customer Service Rep
Employed 2004-2006 I don't recall the pay rate. Provided customer service to customers regarding their cable, home phone or internet services through Cox Cable. Set up new accounts, added and deleted services and provided some technical support assistance. Helped customers understand their bills and billing summaries. Duane Chapman Supervisor. I do not have any contact information. I left this job to start working at Wells Fargo Bank

Wells Fargo Bank 4320 Huron Ave Lubbock Texas 79407 Phone Banker II Employed
2006-2008 Managed customer calls. Addressed and resolved customer product complaints. Gathered and verified all required information for tracking purposes. Defused volatile customer situations. Accurately documented, researched and resolved customer disputed and other issues pertaining to their banking accounts. Opened and closed checking and savings accounts. Edward Delcambre. I do not have any contact information for him. Left this job to work for University Medical Center in June of 2008

University Medical Center 602 Indiana Ave Lubbock Tx 79415 Health Unit Coordinator
(Labor and Delivery, NICU, and Endoscopy) \$26k Employed 2008-Current

Perform all clerical activities required to coordinate patient care procedures. Liaison between the Doctors, nurses, patients and their families. Prepare and maintain all medical records and documents during patients stay as permitted by hospital and departmental policies in a non-nursing capacity. Answer phones, page doctors, relay messages to staff. Coordinate patient care. Transport patients, provide support for patients and families. In charge of admission and discharge paperwork and personal information forms. Schedule appointments or procedures for patients. Susan Chavez (806) 831-1240, Director Anita Meniffee (806) 241-0357 Elizabeth Castillo (806) 775-9260 Still employed with UMC since July 2008

Kingdom Life Fellowship-Lubbock 4202 I-27 Lubbock Tx. Assistant Worship Leader 2009-2015.

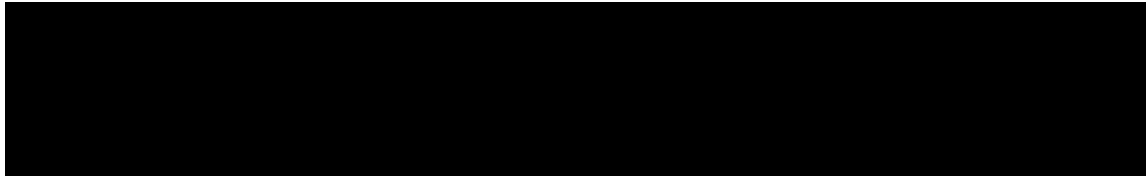
\$1200 annual. Worship Leader 2015-2016 \$2400 annual Selected, taught and executed all praise and worship music selections for services. Taught, sang with and or lead songs as requested. Independently managed and coordinated rehearsals for singers and musicians. Managed all administrative duties related to the Music Department. Built the praise team spiritually, numerically and vocally. Developed quality leaders and singers. Lead the congregation of over 300 in worship each Sunday. Johnny Davis 4202 I-27 Lubbock Tx. Due to the lawsuit, I no longer hold this position.

5. Identify any Church officer, director, Bishop, Supervisor, or Pastor that you reported any of James L'Keith Jones's allegedly inappropriate conduct to. For each report, please state the following:

- a. The full name and address of the person you reported to;
- b. The date or dates that you made reports of inappropriate conduct;
- c. How you reported the conduct, i.e. in person, over the phone, by email, by letter, etc.; and
- d. Describe what you reported to each person.

RESPONSE: *This all started when I was 15 and i was told by my pastor not to tell anyone anything. This was the same pastor that was molesting me. I then brought this to the church in February 2016, that is when my complaint was filed with the church.*

6. Please list the name and address of each medical provider or hospital that have treated and/or examined you for any injuries or symptoms that you contend were caused by the incidents made the basis of this lawsuit. This Interrogatory should include, but is not limited to, any counselors, psychiatrists, psychologists, counselors, or general practitioners.



7. If you contend that you have incurred medical bills as a result of the incident made the basis of this lawsuit, have any of the medical bills been paid by any source including, but not limited to, private or public health insurance, Medicare, Medicaid, public assistance programs, Champus, or any other source? If so, please identify the source of the payment(s), state the amount of the medical bills paid by each source and state the amount you paid or still owe on the medical bills. (This Interrogatory is intended to discover the information necessary to allow the Church to calculate Ms. Pollard's alleged economic damages for medical bills pursuant to Texas Civil Practice and Remedies Code, Section 41.0105).

RESPONSE: *We are in the process of gathering all medical bills and cost associated with this claim. We will forward that information to you, once that process is completed.*

8. Please list and describe the injuries which you contend that you have suffered as a result of the incidents made the basis of this lawsuit, including physical as well as mental injuries, stating as to each when you first became aware of the injury; and, if you are presently having any complaints, please list any of them.

RESPONSE: *I've suffered from suicidal ideation-1997 ongoing. Depression is ongoing for over 15 years. Self-mutilation, which is no longer an issue and hasn't been for over 10 years. I also deal with anxiety and have dealt with it for over 10 years and self isolation.*

9. Have you ever been charged or convicted of a criminal offense, either misdemeanor or felony? If so, please state the date on which said charge or conviction occurred; the offense accused of; the disposition of the charge; the county and state in which said charge/conviction was made.

RESPONSE: *I was charged with a minor domestic dispute with my sister. I have no convictions relating to that incident nor have i ever been charged or convicted in any other incident.*

Respectfully submitted,

JERRY G. MATTHEWS

By: /s/Jerry G. Matthews

Jerry G. Matthews

State Bar No. 13207710

300 West Bedford Street Dimmitt,

Texas 79027

Tel: 806. 647. 0404

Fax: 806. 647.0406

Email:

jmatthews.lawofficesofjgm@gmail.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was served by electronic mail on

April 12, 2017, on the following:

Justin Jeter
Jeter Melder, LLP
1111 S. Akard Street, Suite 100
Dallas, Texas 75215

By: /s/Jerry G. Matthews
Jerry G. Matthews

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

**KIMBERLY D. POLLARD and
J.S. (MINOR CHILD),**

Plaintiffs,

V.

**CHURCH OF GOD IN CHRIST, INC.;
CHURCH OF GOD IN CHRIST,
BOARD OF BISHOPS; and BISHOP
JAMES L'KEITH JONES**

Defendants.

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Case No. 2:16-cv-000238-J

**AFFIDAVIT OF ULESES C. HENDERSON, JR.
IN SUPPORT OF DEFENDANTS'
MOTION TO SET ASIDE THE ENTRY OF DEFAULT
AND BRIEF IN SUPPORT**

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

BEFORE ME, the undersigned authority on this day personally appeared Uleses C. Henderson, Jr., known to me to be the person whose name is subscribed below, who being by me first duly sworn and who did, on his oath depose and state as follows:

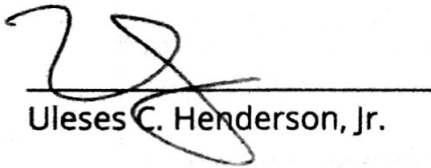
**AFFIDAVIT OF ULESES C. HENDERSON, JR.
IN SUPPORT OF DEFENDANTS'
MOTION TO SET ASIDE THE ENTRY OF DEFAULT
AND BRIEF IN SUPPORT - Page 1**

1. My name is Uleses C. Henderson, Jr.; I am of sound mind and capable of making this affidavit. I make this affidavit based upon personal knowledge, and the facts in it are true and correct.
2. I am a life-long member of the Church of God in Christ, Inc. (the National Church). I am a resident of Los Angeles County, California, and I am duly admitted to practice law before all courts in California.
3. I have been the National Church's General Counsel for the last four years. Before that, I was an attorney within the Church's Office of General Counsel.
4. The Church of God in Christ is a Christian organization in the Holiness-Pentecostal tradition. It is the largest Pentecostal denomination in the United States. The membership is predominantly African-American with more than 6.5 million members and has congregations in 82 countries around the world. The National Church is an active, Tennessee non-profit corporation headquartered in Memphis.
5. The Church of God in Christ has an hierarchical ecclesiastical structure comprised of three levels – the National Church, regional jurisdictions, and local churches. All levels are bound by a common theology and a common Constitution providing, among other things, mechanisms for appointing local pastors and corporate governance.

6. The Church of God in Christ's civil structure is composed of distinct corporations at each ecclesiastical level. The National Church, which Plaintiff has sued in this case, is an active Tennessee non-profit corporation headquartered in Memphis. Each jurisdiction is a separate civil entity formed in the state where it resides and with its own officers and directors. Within each jurisdiction, the local churches are either business entities or unincorporated associations.
7. In 2013, Defendant, James L'Keith Jones, became the Jurisdictional Bishop for the Church of God in Christ Ecclesiastical Jurisdiction of New Mexico. The New Mexico Jurisdiction is an active New Mexico domestic nonprofit corporation according to the New Mexico Secretary of State's records. Its directors are Defendant Jones, Claude L. Bell, Charles H. Hollis, Sr., and Andre Singletary. None of these directors are directors or officers of the National Church.
8. Similarly, Jones is not and has never has been an officer, director, or employee of the National Church. The National Church has never paid him a salary or other wages and, thus, it has never issued him a W-2 or a 1099. Jones receives no remuneration from the National Church.

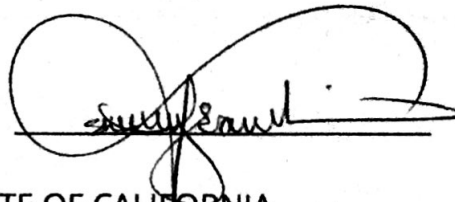
9. Likewise, Jones has no authority to hire, fire, or direct the National Church's employees. He further has no authority to act as an agent for the National Church in the civil context. For example, he does not have the authority to bind the National Church to agreements or contracts.
10. Jones's ecclesiastical duties and responsibilities are detailed in the Church's Constitution. Again, these are purely ecclesiastical responsibilities; they are not civil or corporate duties taken on behalf of the National Church. As a jurisdictional bishop, Jones's duties included the right to appoint and ordain church elders; to be the National Church's representative for church matters within his ecclesiastical jurisdiction; to preside over the Jurisdictional Assembly (which is another ecclesiastical body); and, to appoint and or remove District Superintendents and other appointed jurisdictional officers. Certainly, the allegations and complaints that Ms. Pollard has made against Jones regarding sexual misconduct do not fall within the scope of any of these purely ecclesiastical duties.
11. The National Church's Constitution contains a procedure for the intake and handling of accusations of inappropriate conduct by its pastors and bishops. Ms. Pollard utilized this process when she lodged a complaint against Jones in May 2016.

12. Ms. Pollard's May 2016 complaint against Jones is the only complaint against Jones that has ever been presented to the Board of Bishops.



Uleses C. Henderson, Jr.

SWORN TO AND SUBSCRIBED BEFORE ME by the said Uleses C. Henderson, Jr. this 8th day of August 2017.



NOTARY PUBLIC IN AND FOR THE STATE OF CALIFORNIA

My commission expires: 06/24/2020

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 17
day of August, 2017, by Uleses C Henderson, Jr

proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.



Signature 